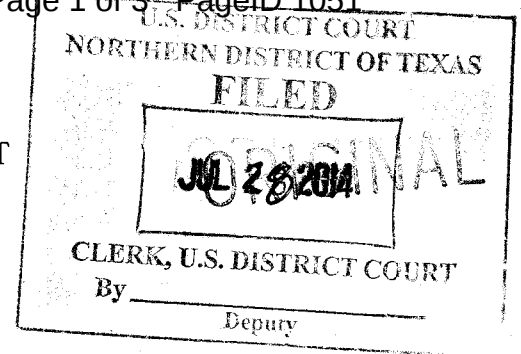


ORIGINAL

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION



UNITED STATES OF AMERICA §
 §
v. § 4-14-CR-023-A
 §
CHRISTOPHER ROBERT WEAST (1) §

MOTION FOR LEAVE OF COURT TO FILE
SUPPLEMENTAL EXHIBIT LIST

COMES NOW, Christopher Robert Weast, through counsel, Assistant Federal Public Defender Angela R. Saad, and respectfully moves this Court for an order granting the Defendant leave of court to file a Supplemental Exhibit List out of time for the following reason:

1. The Defendant is scheduled for trial on July 28, 2014. Pursuant to the Court's order in this case, exhibit lists must be filed July 14, 2014.
2. Defense counsel was appointed February 21, 2014 to represent Mr. Weast. On March 11, 2014, defense counsel timely submitted a designation of expert. This request was pursuant to our defense to the first indictment, which alleged violations of 18 U.S.C. §§ 2252(a)(4)(B), 2252(b)(2), and 2256(8).
3. On April 22, 2014, counsel's appointment was terminated. Defense counsel was reappointed on June 5, 2014 for the competency hearing. On July 8, 2014, we were again reappointed to represent the defendant for jury trial. While defense counsel was appointed to represent the defendant when the June 11, 2014 deadline passed, the scope of representation was limited to "the competency hearing and related matters." On July 15, 2014, the Court denied our motion for reconsideration of appointment of counsel.
4. Defense counsel began communication with an expert witness to review the digital

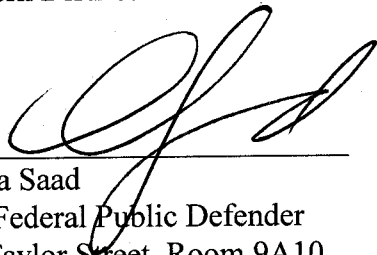
imaging forensic information and remote access and hacking possibilities. Based on our communication with the expert, we requested additional information from the government's expert. We received this information on July 23 and July 24, 2014. We request the additional exhibits to address additional cross examination of the government's witness and also for direct examination of Mr. Bill McGregor, whether he testifies as a fact or expert witness.

5. Counsel respectfully requests that this Honorable Court grant leave to file the Supplemental Exhibit List out of time.

WHEREFORE, Defendant respectfully requests that this Honorable Court allow counsel to file out of time the Supplemental Exhibit List .

Respectfully submitted,

JASON HAWKINS
Federal Public Defender
Northern District of Texas

BY: 
Angela Saad
Asst. Federal Public Defender
819 Taylor Street, Room 9A10
Fort Worth, TX 76102-4612
(817) 978-2753
Texas State Bar No. 24059016

CERTIFICATE OF CONFERENCE

I have attempted to confer with the attorney for the government, Aisha Saleem, and was unable to ascertain her position to this motion.



Angela Saad

CERTIFICATE OF SERVICE

I, Angela Saad, hereby certify that on July 28, 2014, the above motion was had delivered to Aisha Saleem at the Office of The United States Attorney 801 Cherry Street, Suite 1700, Fort Worth, TX 76102.



Angela Saad